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November 20, 1995

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

William F. Caton
Acting Secretary
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1919 M Street, N.W.
Room 222
Washington, DC 20554

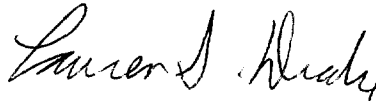
Re: Comments of A.C. Nielsen Company
MM Docket No. 87-268

Dear Mr. Caton:

Transmitted herewith on behalf of A.C. Nielsen Company are an original and four (4) copies of its Comments in MM Docket No. 87-268 regarding the transition toward digital television technology.

Should any questions arise with respect to this matter, please contact either of the undersigned.

Sincerely,



Grier C. Raclin, Esq.
Lauren S. Drake, Esq.

Enclosure

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Advanced Television Systems
and Their Impact Upon the
Existing Television Broadcast
Service

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MM Docket No. 87-268

TO: The Commission

COMMENTS OF A.C. NIELSEN COMPANY

A.C. NIELSEN COMPANY

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November 20, 1995

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SUMMARY

A.C. Nielsen Company ("Nielsen") is the largest provider of "ratings," or audience measurement services, to members of the advertising, broadcast and cable industries. In preparing its ratings and providing these service, Nielsen uses, *inter alia*, Lines 20 and 22 of the video signal to carry "Source Identification ("SID") Codes that uniquely identify the programs that are being evaluated.

In this proceeding, the Commission requests comment on any changes in the Commission's signal carriage ("must carry") rules that might be appropriate to address changes that will occur as a result of the industry's transition to digital broadcasting, or "advanced transmission," technology. In response to the Commission's request for comment, Nielsen urges the Commission to refrain from making any substantive change to the currently-applicable requirement that cable systems carry Nielsen's SID Codes when they carry encoded programming. Nielsen's ratings are a crucial underpinning of the American free television system, and the carriage of Nielsen's SID Codes are crucial to the preparation of ratings. The Commission has historically found that Nielsen's Codes should receive "must-carry" protection, and no change in that determination is justified by the use of digital transmission technology.

Substantial modifications or equipment are not necessary to allow cable systems to carry Nielsen's SID Codes in a digital environment, and no adverse effect would follow from the carriage of Nielsen's digitized SID Codes. Nielsen's codes are now

carried in a compressed, digital mode on at least one operating digital Direct Broadcast Satellite transmission system with no apparent adverse effect resulting to the associated programming or other transmissions. If technical issues do arise with regard to the digital carriage of data such as Nielsen's SID Codes, they can be addressed in the industry's standard-setting bodies, such as the Telecommunications Industry Association ("TIA") or the Electronic Industry Association ("EIA"). Nielsen has been, and will continue to be, an active and supportive participant in such efforts.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service)))))	MM Docket No. 87-268

TO: The Commission

COMMENTS OF A.C. NIELSEN COMPANY

A.C. Nielsen Company ("Nielsen"), through its attorneys, hereby provides its comments on some of the issues posed in the *Fourth Further Notice of Proposed Rule Making and Third Notice of Inquiry* released in the above-referenced docket on August 9, 1995 (the "NPRM" or "Notice"). In support of these Comments, Nielsen states as follows:

I. BACKGROUND: THE "NIELSEN RATINGS"

1. Nielsen provides a variety of "rating" or audience measurement services to members of the advertising, broadcast and cable industries. The most commonly known of these services is Nielsen's "national" broadcast ratings, whereby Nielsen estimates the size and demographic composition of audiences viewing nationally-televised network and syndicated and cable network programs. In addition, Nielsen

provides advertising tracking services, whereby Nielsen tracks households receiving the broadcast or cablecast of specified advertisements within programs.

2. Nielsen's national ratings historically are compiled from three principal sources of information, each of which must be extremely reliable. These are: 1) "Program Line-Up" Information, revealing the network or syndicated program being transmitted by a broadcast station at a specified time, which Nielsen obtains from its Automated Measurement of Line-up ("AMOL") System;¹⁴ (ii) "Metering" Information, revealing the channel to which each television receiver in a Nielsen Metered Household is tuned at the specified time, which Nielsen obtains from "meters" connected to the television receivers located in those households; and (iii) Demographic Information, revealing the age and gender of the persons watching the television receiver at the specified time, which Nielsen obtains from "People Meters" located in the Metered Households.

3. Nielsen's AMOL System provides Nielsen with Program Line-Up Information by imbedding Source Identification ("SID") Codes on Lines 20 or 22 of nationally distributed, advertising-supported broadcast programs at the time of their origination. The SID Codes are unique to each program and identify the program's originating source and the date and time of the program's origination. Nielsen's enhanced AMOL System, now in the initial stages of being deployed, is also capable of embedding separate identifying information for each link in a program's distribution

¹⁴ Nielsen will provide commercial verification services to allow customers to verify when and where advertisements are broadcast.

chain -- information which is increasingly being demanded by the advertising and programming industries to track the distribution and acceptance of rated programs.

4. Once embedded, Nielsen's SID Codes are delivered with the program throughout its distribution, eventually to local broadcast stations (whether network affiliates or independents) and cable systems (where these systems carry encoded programming) and, eventually, into viewers' homes. Nielsen's SID Codes cannot be seen by viewers because the Codes are transmitted within the "overscan" area of the television picture. Nevertheless, while they are invisible to viewers, the Codes are able to be decoded and "read" by Nielsen for the purpose of verifying the broadcast of a program, and thus preparing ratings, at the time of the program's transmission into Metered Households.^{2/}

^{2/} To maintain the accuracy of its ratings in a multi-media environment, and to address the complications resulting from the growing use of video compression systems, Nielsen also is developing, proprietary "signal-encoding" technology that will rely upon "subvideo" transmission to monitor program viewing "passively" (e.g., without direct connection to the television receiver), regardless of the "channel" on which that programming is displayed in the monitored home. In other words, instead of monitoring the *channel* being tuned and extrapolating the program being received from the Program Distributor Line-Up Information, Nielsen's "signal-encoding" technology will allow it to monitor the actual *program* being viewed *without* the need to determine the channel to which the receiver is tuned to allow that viewing. In this and other ways, Nielsen has taken the lead in developing innovative approaches to solve technological problems, constantly updating its information gathering methodologies to anticipate and address changes in program-delivery systems, and in meeting the demands of the broadcast, cable or advertising industries or viewing public. When discussing Nielsen's contribution into the technical innovation of monitoring broadcast television, a recent article appearing in *Multichannel News*, noted:

Within this new technical environment, Nielsen's challenge is to report accurately what program is being tuned to on a particular channel, and it says signal encoding is the answer. "It's a great idea," said Howard Shimmel, Vice President of audience research for MTV Networks, "We've needed it for years in the industry, especially the cable industry."

Moss, *Multichannel News*, NIELSEN SET TO FIELD TEST ITS NEW METER TECHNOLOGY, June 19, 1995, at 9.

5. The transmission of Nielsen's SID Codes over broadcast frequencies has been consistently authorized by the FCC for over 26 years. The Commission first authorized the use of the vertical blanking interval ("VBI") to carry source identification codes in 1970, when it determined that the transmission of SID Codes served an "important service . . . without which [a station's] viable operation . . . would be impossible." *In the Matter of Amendment of Part 73, Section 73.682(a) of the Commission's Rules*, Dkt. No. 18605, *Report and Order*, 22 F.C.C.2d 536, 545 (1970). In 1981, the Commission authorized the transmission of Nielsen's SID codes on Line 20 of the VBI, having previously found that the "recovery of SID signal is accurate and extremely reliable," and that the record established that "there is virtually no potential for program degradation by the proposed SID transmissions." *Notice of Proposed Rule Making and Memorandum Opinion and Order*, BC Dkt. 78-308, 43 Fed. Reg. 49331, 49332 (October 23, 1978); and see *Public Notice*, FCC 70-387, 22 F.C.C.2d 779, 780 (1970). In 1989, the Commission further authorized the transmission of Nielsen's AMOL codes on Line 22 of the Active Video Signal,^{3/} noting that the codes were an "integral part of the associated program" and that ratings were "of interest to virtually every broadcaster," and that Nielsen's use of Line 22 "will not visibly degrade the picture presented to

^{3/} Nielsen's authority to use Line 22 to transmit AMOL SID Codes was issued on a "temporary" basis because the Commission wanted to evaluate whether Nielsen's usage of Line 22 would interfere with usage by other parties. In 1990, Nielsen petitioned the Commission for "permanent" authority to use Line 22. That request has been pending with the Commission since it was filed, and is to be addressed by the Commission in MM Docket No. 95-42, *Digital Data Transmission Within the Video Portion of Television Broadcast Station Transmissions*, MM Docket No. 95-42, *Notice of Proposed Rule Making*, 10 FCC Rcd 4918 (1995).

viewers." Letter from Roy J. Stewart, Chief, Mass Media Bureau, to Grier C. Raclin (November 22, 1989) (the "Nielsen Authorization").

6. The Commission has even *previously determined* that Nielsen's Codes *are* entitled to "must carry" status. In its Reconsideration Order in the original "Must Carry" proceeding, the Commission granted this protection after finding that Nielsen's Codes "constitute information intrinsically related to the particular program received by the viewer," and "provide important information that is useful to both broadcasters and cable operators." *In the Matter of Implementation of the Cable Television Consumer Protection and Competition Act of 1992*, MM Docket No. 92-259, *Memorandum Opinion and Order*, 9 FCC Rcd. 6723 (1994) ("*Must-Carry Reconsideration Order*"). The Commission's decision that SID Codes were entitled to carriage on cable systems affirmed Nielsen's assertion that allowing cable systems to strip codes (by not providing the Codes with "must carry" protection) would undermine the integrity of Nielsen's ratings as well as the ability of viewers to have their interests reflected in programming. *Id.* at ¶¶ 42-50.

II. THE RELEVANT ISSUES RAISED IN THE FOURTH FURTHER NOTICE OF PROPOSED RULE MAKING AND THIRD NOTICE OF INQUIRY

7. The Cable Act requires the FCC to review whether any change in its "Must Carry" Rules is required to address digital television transmission technology, and specifically orders the Commission

to initiate a proceeding to establish any changes in the signal carriage requirements of cable television systems necessary to ensure cable carriage of such broadcast signals of local commercial television stations which have been changed to conform with [advanced television] standards.

Notice at ¶81. To address this issue, the Commission in this proceeding has requested comment on, *inter alia*:

- any relevant difference in the [must carry] rules or policies that might be needed during the transition [to digital broadcasting technology] or as a consequence of ATV having replaced NTSC broadcasting;
- what technical modifications may be needed to enable cable systems to deliver ATV signals . . . and what costs may be associated with these modifications.

8. It is to respond to these and similar issues relating to the must-carry obligations of cable systems in a digital environment that Nielsen has prepared these Comments. As set forth in detail below, no change to the requirement that cable systems must carry Nielsen's SID codes is required in anticipation, or in connection with the implementation, of digital transmission technology. The basis for that requirement -- the crucial role of Nielsen's ratings in support of the American free television system, and the crucial role of Nielsen's SID code transmission in support of the preparation of ratings -- is applicable equally in analog and digital environments. The elimination of that requirement simply because television broadcasters utilize more recent technology in their operations is unwarranted and would undermine a fundamental basis of the free broadcast system.

III. NIELSEN'S SID CODES ARE VITAL UNDERPINNINGS TO THE FREE BROADCAST SYSTEM

9. Nielsen's ratings are an important foundation on which the free broadcast system is based, and the transmission of Nielsen's SID Codes is vital to the preparation of ratings. Nielsen's ratings are important foundations of the advertiser-supported broadcast and cable program industries, both of which utilize ratings to judge the acceptance of broadcast and cable program offerings among viewers and to establish audiences "delivered" to the advertiser through their viewing of the program and advertisements. Advertisers use Nielsen's services to allocate their advertising expenditures; producers of broadcast and cable programming (virtually every major cable program provider is a subscriber to Nielsen's ratings) use ratings to evaluate the acceptance of programs when making creative programming decisions; even the Commission itself relies upon Nielsen's ratings in connection with, *inter alia*, the enforcement of the FCC's Rules and Regulations. See Letter from Scott Roberts, Senior Economist, Mass Media Bureau, to Lawrence Laskey, Assistant General Counsel of Nielsen, (June 10, 1994) (requesting Nielsen's ratings information for use in connection with Prime Time Access Rule; territorial exclusivity requirements and signal carriage requirements).

10. Congress has recognized that maintaining and promoting our system of advertiser-supported broadcasting is in the national interest. Specifically, Congress has found that

[b]roadcast television programming is supported by advertising revenues. Such programming is free to those who own television sets and do not

require cable transmission to receive broadcast signals. There is a substantial governmental interest in promoting the continued availability of such free television programming, especially for viewers who are unable to afford other means of receiving programming. . . .

See Cable Television Consumer Protection and Competition Act of 1992, Pub. L. No. 102-385, 106 Stat. 1460 (Oct. 5, 1992) (the "Cable Act"). Congress also stated that

[t]elelevision broadcasters and cable television operators compete directly for the television viewing audience, programming materials, and advertising revenues. The Federal interest in ensuring that such competition is fair and operates to the benefit of consumers requires that local broadcast stations be made available on cable systems. . . .

H.R. Conf. Rep. No. 862, 102d Cong., 2d Sess. (1992) at 54.

11. Similarly, the Senate Commerce, Science and Transportation Committee stated in its Report on S.12, which became the Cable Act, that

[t]he governmental interests at issue here involve the preservation of the system of local television broadcasting and access to local television stations' programming by subscribers to cable television and the substantial minority of consumers who cannot or do not subscribe to cable television. The most effective means of fulfilling these objectives is certainly regulations requiring that cable systems devote a modest portion of their channel capacity to retransmitting local television signals.

S. Rep. No. 92, 102d Cong., 2d Sess. (1991) ("Senate Report") at 60.

12. The House Energy and Commerce Committee Report explained that the continued viability of advertiser-supported broadcasting promotes long-standing policies of Congress as reflected in the Communications Act:

Broadcasters who lose substantial portions of their audience will be unable to continue to provide local public service programming, and may be forced to discontinue service altogether. That result would not only lead to diminished diversity of opinion, but also to reduced competition in the local video market and the strengthening of a cable system's dominant position in providing video services, contrary to the strong governmental interest in fostering active competition. The Committee wishes to make

clear that its concerns are not limited to a situation where stations are dropped wholesale by large numbers of cable systems. The incremental weakening of local broadcasters that results from being dropped across a portion of their market, or by discriminatory carriage conditions, will result in those stations' losing their ability to compete in a competitive programming market.

The almost 40 percent of American television households which do not have cable service will, as a consequence, be deprived of local program services and the diverse voices that existing local television stations provide. Such households will either lose this diversity entirely or be forced to become cable subscribers, effectively losing the benefits of the system of free local broadcasting which is at the core of the Communications Act.

H.R. Rep. No. 628, 102nd Congress, 2nd Sess. (1992) ("House Report") at 64.

13. Both Congress and the FCC have long recognized that the Nielsen ratings, and the integrity of those ratings, are important underpinnings of the advertising, broadcast and cable industries. In the Cable Act, for example, Congress determined that to allow a cable system to delete or reposition a broadcast station's programming during periods that the station is subject to ratings analysis could greatly undermine the integrity of the "ratings" of that station, and therefore prohibited such changes during ratings periods. Accordingly, the Commission has adopted regulations implementing this prohibition. See *In the Matter of Implementation of the Cable Television Consumer Protection and Competition Act of 1992 Broadcast Signal Carriage Issues*, MM Docket No. 92-259, *Report and Order*, 8 FCC Rcd. 2965 at ¶ 109 (1993) ("Order").

14. The FCC separately has long recognized that ratings services provided by organizations such as Nielsen, and the transmission of SID codes in support of those services, are in the public interest because of their importance to the broadcast and cable

industries. In its *Report and Order in the Matter of Permitting Transmission of Program-Related Signals in the Vertical Blanking Interval of the Standard Television Signal*, 43 Fed. Reg. 49331, 49333 (Oct. 23, 1978) (hereinafter cited as "*Program-Related Signals in the VBI*"), the Commission noted that "[t]he transmission on broadcast frequencies of signals intended to be used in the rendition of a nonbroadcast automatic program identification service [is] in the public interest" (quoting *Program Identification Patterns*, Docket No. 19314, 43 F.C.C. 2d 927, 944 (1973)). The Commission also has stated that the use of SID codes is "essential to [a network's] efficient operation," *TV Visual Transmissions for Program Identification, Public Notice*, 22 F.C.C. 2d 779, 780 (1970) (hereinafter cited as *TV Program Identification Public Notice*), and that the codes and the ratings produced therefrom are "important . . . to many entities involved in producing the programs which [a] station broadcasts, and without which [a station's] viable operation, however convenient and economical, would be impossible." *TV Visual Transmissions for Program Identification, Report and Order*, 22 F.C.C. 2d 536, 545 (1970) (hereinafter cited as "*TV Program Identification Report and Order*"). The Commission has found ratings services to be in the public interest because they "convey indirect benefits [to the public] by making the operation of broadcast stations more convenient and economical, [and by] making possible a more adequate financial base for the provision of basic broadcasting service." *Order* at ¶ 109.

15. In furtherance of these goals, as indicated above, the Commission has for over 26 years authorized the transmission by broadcast stations of SID Codes in

connection with the preparation of ratings. *See, e.g., TV Program Identification Report and Order*. In its *In re Radio Broadcast Services Order*, 46 Fed. Reg. 40024 (Aug. 6, 1981), the Commission specifically authorized the use of Line 20 of the VBI to carry SID Codes "so that faster and more accurate comparative program popularity ratings could be obtained," 46 Fed. Reg. at 40024, and stated at the time that "we consider the transmission of the SID signal to be in the public interest in view of the program identification function it serves." *Id.* Similarly, when the Commission began authorizing the transmission of SID Codes on Line 22 in the active video signal for program identification purposes in 1985, *see* Letter from James C. McKinney, Chief, Mass Media Bureau, to Burton Greenberg (July 18, 1985) (the "Telescan Authorization"), it specifically found that SID Codes were beneficial and contributed to efficient broadcast operations, *TV Program Identification Public Notice, supra*, 22 F.C.C. 2d at 779-80; *see also* Nielsen Authorization at 2.

16. In sum, the Commission has repeatedly determined that Nielsen's SID Codes, and the ratings which they generate, are important to the broadcast industry and the public. For that reason, and after determining that Nielsen's Codes "constitute information intrinsically related to the particular program received by the viewer," and "provide important information that is useful to both broadcasters and cable operators," the Commission *has already determined* that Nielsen's Codes *deserve must-carry status*. *See In the Matter of Implementation of the Cable Television Consumer Protection and Competition Act of 1992*, MM Docket No. 92-259, *Memorandum Opinion and Order*, 9

FCC Rcd. 6723 (1994). The transition to digital television transmission technology does not alter the basis of that decision. Nothing related to a change in television technology justifies or requires a change in the Commission's prior determination that the SID Codes are entitled to must-carry status. The importance of protecting the Codes has not abated, and a reversal of the Commission's long-standing position on the carriage of the SID Codes without any apparent justification would greatly disserve the Commission's and the public interest.

IV. ONLY NOMINAL MODIFICATIONS ARE REQUIRED TO ENABLE CABLE SYSTEMS TO CARRY NIELSEN'S SID CODES IN A DIGITAL ENVIRONMENT

17. Carriage of Nielsen's digital SID Codes by cable systems can be accomplished without materially affecting the system's technical operations, requiring substantial changes to a system's infrastructure, or requiring significant investment by the system operator. As with other digital data, Nielsen's data can be transmitted either (a) in a compressed digital mode whereby it is stripped from the associated programming, and then sent in its own data packet to the receive site where it is reencoded in an analog mode, or (b) transmitted as an integral or part of the main programming. In either case, only minor technical enhancements, if any, are needed to implement either of these processes.

18. Because the Commission's Rules require cable programmers to carry closed captioning now carried on Line 21 of the Vertical Blanking Interval, *see* 47 C.F.R. § 76.606, digital transmission equipment manufacturers currently are designing the

technology needed for the digital carriage of closed captioning into digital transmission equipment. Expanding the capability to include the transmission of Nielsen's Codes now being transmitted on lines 20 and 22 will require little or no additional effort or expense. Indeed, Nielsen is now working with digital equipment manufacturers to accomplish that result. *See* attached Affidavit of Paul Kempter, Engineering Manager of Nielsen Media Research. Thus, as was the case with the Commission's decision to grant must-carry status to Nielsen's *analog* codes, the *digital* carriage of Nielsen's codes will not interfere with normal cable or intermediate transmission systems or operations, and will not cause cable operators to incur more than nominal costs.

19. Moreover, Nielsen's Codes are presently transmitted over at least one operating direct broadcast satellite transmission system that utilizes compressed, digital transmission technology, without interfering with the system's operations or requiring any special equipment. Indeed, *no* modifications to the direct broadcast satellite transmission system were necessary to carry Nielsen's Codes. *See* Affidavit of Paul Kempter. There is no reason to expect insurmountable issues to be raised in connection with digital transmissions, but if issues do arise, the industry itself is fully capable of addressing those issues.

20. The Commission traditionally has relied upon the marketplace to ensure preservation of signal quality and compatibility of technologies, rather than impose standards through regulation. In the Second Report and Order in *the Matter of the Use of Subcarrier Frequencies in the Aural Baseband of Television Transmitters*, Docket No. 21323,

55 R.R.2d 1642 (1984) (“*Second Report and Order*”), for example, the Commission declined to impose specific standards for permissible uses of the television aural baseband to ensure television receiver compatibility, noting that “strong marketplace incentive exists to maximize the quality of service and the rules need not set detailed specifications.” *Id.* at ¶ 15. In reaching this conclusion, the Commission reasoned that “technology should not be restrained by earlier choices by manufacturers,” and that “any approach to ensuring compatibility should not impede the opportunity for marketplace advances in technology.” *Id.* at ¶ 9.

21. Similarly, in the *Inquiry Into The Need For A Universal Encryption Standard For Satellite Cable Programming*, 5 F.C.C. Rcd. 2710 (1990), the Commission declined to promulgate a universal standard for encryption of satellite cable programming intended for private viewing, concluding that such a standard would not serve the public interest. In affirming its earlier conclusions, the Commission concluded that a universal standard for encryption technology would stifle development of competitive or improved encryption techniques, stating that “the *market* had settled on the Videocipher II system as a *de facto* standard . . . and a mandatory standard would limit the incentives for innovation in encryption technology.” *Id.* at 2710 (*emphasis supplied*). There is no reason for the Commission to reach a different conclusion in this case. Of course, Nielsen is ready, willing and able to assist in the industries consideration of appropriate standards and guidelines.

V. CONCLUSION: NO CHANGE SHOULD BE MADE TO THE MUST-CARRY RULES INsofar AS THEY REQUIRE THE CARRIAGE OF NIELSEN’S SID


**CODES IN CONNECTION WITH THE CARRIAGE OF ENCODED
PROGRAMMING**

22. It is well established that Nielsen's ratings are crucial to the support of the American free television system, and that the transmission of Nielsen's SID Codes is crucial to the preparation of those ratings. Requiring cable systems to carry the SID Codes in a digital environment will not require them to substantially modify their systems nor raise technical interference issues. Moreover, requiring carriage of Nielsen's SID Codes is consistent with Commission precedent. Accordingly, no change is necessary to the must-carry status of Nielsen's SID Codes in connection with the transition to digital transmission technology.

WHEREFORE, A.C. Nielsen urges the Commission to adopt regulations in accordance with the opinions and arguments as herein expressed.

Respectfully submitted,

A.C. NIELSEN COMPANY

By: 
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Lauren S. Drake, Esq.

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Its Attorneys

November 20, 1995

AFFIDAVIT OF PAUL KEMPTER

The undersigned, Paul Kempter, being first duly sworn, does hereby state as follows:

1. I am an Engineering Manager at Nielsen Media Research in Dunedin, Florida. I have a Bachelor's degree in Electrical Engineering Technology, and a Masters degree in Business Administration, from Old Dominion University.
2. The same basic technology and design is used to transmit Nielsen's Codes in a digital environment as is used to transmit digital closed captioning information now transmitted on Line 21 of the analog signal. Therefore, manufacturers of digital transmission equipment need make only minor modifications to their equipment designs to transmit Nielsen's SID Codes.
3. Indeed, Nielsen's Codes are presently transmitted in a compressed digital mode over an operating direct broadcast satellite system with no special modifications having been made or required to the transmission system.
4. I have reviewed the foregoing *Comments* of A.C. Nielsen Company in MM Docket No. 87-268, and the factual allegations made therein are true and correct.

The foregoing is true and correct to the best of my knowledge, information and belief.

Signed: _____

Paul Kempter
Engineering Manager
Nielsen Media Research

Dated: _____

11/20/95

CERTIFICATE OF SERVICE

I, Judith K. Harris, a secretary in the law firm of Gardner, Carton & Douglas, certify that I have this 20th day of November, 1995, caused to be sent via hand delivery, a copy of the foregoing COMMENTS OF A.C. NIELSEN COMPANY to the following:

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